

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUN 10 1987

In the Matter of)
The Impact of Advanced Television) RM-5811
Technologies on Local Television)
Broadcasting)

FCC
Office of the Secretary

COMMENTS

Buffalo Broadcasting Co., Inc. (WIVB-TV), licensee of Television Broadcast Station WIVB-TV, Buffalo, New York, by its attorneys, hereby submits its Comments on the "Petition for Notice of Inquiry" filed by the Association of Maximum Service Telecasters, the National Association of Broadcasters and 56 other broadcast organizations and companies (hereinafter jointly referred to as Petitioners) on February 13, 1987.

1. The Petition for Notice of Inquiry urged the Commission to initiate an inquiry into the issues arising from the introduction of High Definition Television (HDTV) and other advanced television technologies, and the possible impact of these new technologies on the availability of local broadcast service and the local broadcasting system. As noted by the Petitioners, the purpose of such an inquiry would be to "enable the Commission to make an informed determination as to what regulatory measures, if any, are necessary to ensure that free, universal service provided by local broadcasters has an opportunity to compete in the video marketplace of the future."

2. WIVB-TV applauds the initiative of the Petitioners in

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directing the Commission's attention to the critical issues confronting local broadcasters as HDTV, the next generation of television technology, emerges on the video scene. HDTV has been described as "a system designed to allow viewing at about three times picture height such that the transmission system is virtually or nearly transparent to the level of detail that would have been perceived in the original scene by a viewer with average visual acuity." Report -801-1, International Radio Consultative Committee (CCIR).

3. As enumerated by the Petitioners and endorsed by WIVB-TV, the issues that ought to be explored by the Commission in connection with HDTV include the following:

(1) the features, capabilities and developmental status of advanced television production, transmission and reception systems either now under development or whose development is foreseen, including improvements in the current NTSC system, enhanced 525-line systems and HDTV systems;

(2) the extent to which each of these new technologies is compatible with

- (a) existing NTSC receivers, and,
- (b) current local broadcast channels;

(3) the extent to which each of these new technologies can be transmitted by home video delivery vehicles competitive with local broadcast stations, including cable, VCRs, videodiscs, DBS, and MMDS/ITFS;

(4) the means by which the various improved television technologies will enter the home video marketplace, the timetables under which they will do so, and the effect they will have on the home video market;

(5) the perceived public interest implications of these developments, including the effect on the universal reach, competitive posture and long-term viability of the local free broadcasting system; and,

(6) the options the Commission might consider to provide local broadcast stations the opportunity to compete in the home video markets of the future, including appropriate spectrum-allocation and interference-protection policies.

In the view of WIVB-TV, the most critical among the issues that should be considered by the Commission is the availability of spectrum space. It is estimated that consumer electronics manufacturers will be moving toward an introduction of HDTV equipment in the U.S. within the next three to five years. Prototype equipment demonstrated thus far is capable of delivering the high resolution, better color, and wider picture of HDTV programs by satellite, cable, disc and cassette tape. As the NAB HDTV Task Force has recently noted:

"Terrestrial broadcast is the only medium which cannot currently deliver HDTV. The HDTV picture contains on the order of six times more information than current pictures which means that additional spectrum space must be used for its transmission, even after application of the most advanced technologies for compressing picture information."

Without the allocation of additional spectrum space, local broadcasters would be effectively shut out of the HDTV marketplace. Such a result could permanently relegate terrestrial TV broadcast stations to second class status, much like AM radio when viewed in competition with the technically superior FM broadcast service. WIVB-TV seconds the Petitioners' warning that inaction on the part of the Commission at this time may precipitate such a result. As stated, "the potential impact of the HDTV transition on the local broadcast system of this country has sufficiently serious spectrum

allocation implications to warrant an immediate and thorough Commission investigation along the lines requested in [the] Petition."

4. WIVB-TV is committed to providing technically competitive broadcast service to the residents of Buffalo, New York and its surrounding environs. In order to maintain a technically competitive position in the video marketplace, however, the station must be able to take advantage of emerging technologies such as HDTV. WIVB-TV and other local broadcasters will only be able to do so, however, if the Commission acts quickly to ensure the compatibility of the local broadcast system with HDTV.

Respectfully submitted,

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June 10, 1987

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